

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, THE ESTATE
OF CHERRIGALE TOWNSEND and THE HELEN
CHRISTINE TOWNSEND MCDONALD TRUST,

Plaintiffs,

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED
SHEERAN, ATLANTIC RECORDING
CORPORATION, d/b/a ATLANTIC RECORDS, and
SONY/ATV MUSIC PUBLISHING, LLC,

Defendants.

ECF CASE

17-cv-5221 (LLS)

**DECLARATION OF
DONALD S. ZAKARIN
IN SUPPORT
OF DEFENDANTS' FOURTH
MOTION *IN LIMINE***

I, DONALD S. ZAKARIN, declare as follows:

1. I am a member of Pryor Cashman LLP, counsel for defendants Edward Christopher Sheeran ("Sheeran"), Atlantic Recording Corporation d/b/a Atlantic Records ("Atlantic") and Sony/ATV Music Publishing LLC ("SATV," together with Sheeran and Atlantic, the "Defendants"). I have personal knowledge of, and am fully familiar with, the facts set forth in this Declaration, which I respectfully submit in support of Defendants' Fourth Motion *In Limine*.

2. The purpose of this Declaration is to provide the Court with documents referenced in Defendants' Memorandum of Law in support of their Fourth Motion *In Limine*.

3. Annexed as **Exhibit 1** is a true and correct copy of an article appearing in the publication *Spin*.

4. Annexed as **Exhibit 2** is a true and correct copy of an article appearing in the publication *Billboard*.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 18, 2020

A handwritten signature in black ink, appearing to read 'Donald S. Zakarin', written over a horizontal line.

DONALD S. ZAKARIN